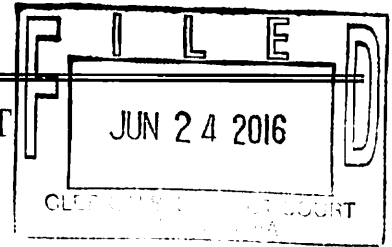


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of Virginia



United States of America
v.
Jorge Alfredo CISNEROS-JEREZ,

Case No.

3:16mj163

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 24, 2016 in the county of Richmond in the
Eastern District of Virginia, the defendant(s) violated:


Code Section
Title 8 U.S.C. 1326(a)

Offense Description
Illegal reentry by alien after deportation/removal

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Deportation Officer William Chin
Printed name and title

Sworn to before me and signed in my presence.

Date: 06/24/2016

City and state: Richmond, Virginia


/s/ Roderick C. Young
United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No.
)	
Jorge Alfredo CISNEROS-JEREZ,)	
a.k.a. Jorge JEREZ,)	
a.k.a. Moses CISNEROS,)	
a.k.a. Jorge CISNEROS,)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, William Chin, being duly sworn state the following:

1. I am a Deportation Officer for U. S. Immigration & Customs Enforcement ("ICE"), and am currently assigned to the Richmond Sub-Office of the Washington Field Office. I have been employed by the Agency since April 2001. My duties as a Deportation Officer involved in the enforcement of the Immigration and Nationality Act, particularly the location and apprehension of criminal aliens for prosecution and removal.
2. This affidavit is in support of a criminal complaint charging Jorge Alfredo CISNEROS-JEREZ, with Reentry After Deportation, in violation of 8 U.S.C. § 1326(a). As described herein, CISNEROS-JEREZ, a citizen of El Salvador, is an alien who was previously removed from the United States, reentered the United States, and was found in the United States

within the Eastern District of Virginia without having first obtained the express consent of the Attorney General or, his successor, the Secretary of Homeland Security.

3. The facts and information contained in this affidavit are based on my personal knowledge and observations, information conveyed to me by other law enforcement officials, and my review of records, documents, and other physical evidence obtained during the course of this investigation. This affidavit contains information necessary to support probable cause, but is not intended to include each and every fact and matter observed by me or known to the government.
4. A review of ICE's files and computer records revealed that CISNEROS-JEREZ, born May 20, 1974, in El Salvador, first made illegal entry into the United States without inspection at or near Houston, Texas, on or about June 1, 1998. On May 14, 1999, at Nassau County, New York, CISNEROS-JEREZ was convicted in the District Court for Driving While Impaired, and a fine was imposed.
5. CISNEROS-JEREZ was encountered by INS Agents while he was incarcerated at the County Jail at Nassau County, New York, on August 9, 2000. He was placed in Removal Proceedings through service of a Notice To Appear, in person. CISNEROS-JEREZ was granted Voluntary Departure to El Salvador by an Immigration Judge, from New York, New York, on August 31, 2000, stipulating that CISNEROS-JEREZ had to

depart the United States on or before December 29, 2000. CISNEROS-JEREZ failed to depart as ordered.

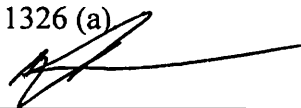
6. On August 18, 2000, CISNEROS-JEREZ was convicted in the District Court at Nassau County, New York, for Resisting Arrest, and an Order of Protection Term was issued for 40 days.
7. On June 6, 2005, CISNEROS-JEREZ was convicted in the District Court at Nassau County, New York, for Criminal Contempt-2nd: Disobey Court, and an Order of Protection Term was issued for 60 days.
8. On September 24, 2009, CISNEROS-JEREZ was convicted in the General District Court – Manchester at Richmond, Virginia, for Obstruct Justice: without Threats / Force and was sentenced to 90 days incarceration.
9. CISNEROS-JEREZ was encountered by ICE Agents while he was incarcerated at the Richmond City Jail at Richmond, Virginia, on September 14, 2009. On December 14, 2009, CISNEROS-JEREZ was removed to El Salvador.
10. CISNEROS-JEREZ was also served with a warning that he was barred from entering the United States for a period of 10 years from the date of notice, and was also explained the consequences for reentering the United States without permission.
11. On an unknown date, on or after December 14, 2009, CISNEROS-JEREZ illegally re-entered the United States without having first obtained the

express written consent of the Attorney General, or his successor, the Secretary of Homeland Security.

12. On February 12, 2010, CISNEROS-JEREZ was encountered by Border Patrol Agents from the Rio Grande Sector, Rio Grande City, Texas and was arrested.
13. On February 16, 2010, CISNEROS-JEREZ was convicted in the United States District Court, Southern District of Texas, McAllen Division, for Illegal Entry, in violation of 8 USC 1325 (a)(1), and was sentenced to 30 days.
14. On May 17, 2010, CISNEROS-JEREZ was removed to El Salvador. CISNEROS-JEREZ was also served with a warning that he was barred from entering the United States for a period of 20 years from the date of notice, and was also explained the consequences for reentering the United States without permission.
15. On an unknown date, on or after May 17, 2010, CISNEROS-JEREZ illegally re-entered the United States without having first obtained the express written consent of the Attorney General, or his successor, the Secretary of Homeland Security.
16. On June 24, 2016, information about CISNEROS-JEREZ was relayed to Deportation Officer William Chin, as well as information received about the residence, establishing that CISNEROS-JEREZ was back in the United States and residing at 2830 Broad Rock Boulevard, Apt. #3, Richmond,

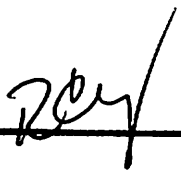
Virginia 23224. Deportation Officer William Chin conducted a review of various electronic databases which confirmed CISNEROS-JEREZ's address, and utilities service at that address in his name. In addition, I reviewed evidence from other police agencies establishing that CISNEROS-JEREZ holds an account for cell phone service with the same address as stated above.

17. Based on the facts and information set forth above, I respectfully submit that there is probable cause to believe that CISNEROS-JEREZ has illegally reentered the United States after having been deported in violation of Title 8, United States Code, Section 1326 (a)



William Chin
Deportation Officer
United States Immigration &
Customs Enforcement

Sworn to and subscribed
Before me on this ____
June 24, 2016

/s/ 
Roderick C. Young
United States Magistrate Judge